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March 24, 2025

**VIA CM/ECF**

Mr. David A. O'Toole, Clerk of Court  
United States District Court for the Eastern District of Texas

**RE:** Notice of Supplemental Factual Authority,  
*Harris v. Carlson*, No. 4:24-cv-00737-SDJ

I write to advise the Court of additional factual support for Petitioner's motion to defer summary judgment proceedings until after discovery. (Doc. 11).

On February 19, 2025, the United States District Court for the Eastern District of Texas entered judgment against Chris Remley and sentenced him to a term of 36 months of probation. (Doc. 27, Case No. 4:23-cr-00263-ALM-AGD). According to the sentencing hearing minute entry, the Sentencing Guidelines called for 30–37 months of imprisonment. (Doc. 26, Case No. 4:23-cr-00263-ALM-AGD). But Mr. Remley's attorney requested a downward variance, which the Government did "not oppose[]." (*Id.*). The Court "grant[ed]" the "variance based on lack of criminal history, role in the offense, remorse, acceptance of responsibility, age, on bond for length of time and in compliance." (*Id.*).

Petitioner has explained his need for discovery into whether Mr. Remley's false accusations were accompanied by *any* expectation, offer, discussion, or agreement concerning his sentence, which would directly impact his credibility. (*See* Doc. 11 at 10–11, 14 at 5). That Mr. Remley received a modest term of probation upon the Government's consent suggests—at least—that he hoped for favorable treatment by the Government, which it appears he received. Petitioner respectfully submits that discovery into these issues is necessary to mount a meaningful defense and for this Court to decide whether ATF was authorized to revoke Petitioner's federal firearms license.

For the reasons above and in Petitioner's motion, the Court should defer any summary judgment proceedings, allow discovery in this case, hold an evidentiary hearing, and then ultimately set aside ATF's improper revocation of Petitioner's federal firearms license. Petitioner also respectfully requests an expeditious ruling on his motion. ATF unlawfully took away Petitioner's livelihood. Every additional day without his license is irreparably harmful.

Respectfully submitted,

/s/ Chadwick Lamar

Chadwick Lamar  
Counsel for Petitioner  
Admitted *pro hac vice*

cc: All counsel of record (via CM/ECF)